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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Chapter 11 Case No. 19-30088 (DM)
(Lead Case)
(Jointly Administered)

**REORGANIZED DEBTORS' RESPONSE TO
TRADE COMMITTEE'S STATEMENT OF ISSUES
AND DESIGNATION OF ADDITIONAL ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL**

Relates to Docket Nos. 8261, 8443.

Pursuant to Rule 8009(a)(2) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), PG&E Corporation and Pacific Gas and Electric Company, as reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**,” as applicable) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), submit this response to the July 17, 2020 filing by the Ad Hoc Committee of Holders of Trade Claims (the “**Trade Committee**” or “**Appellant**”) of its *Statement of Issues, Designation of Items to be Included in the Record, and Certification Regarding Transcripts* [Dkt. No. 8443] (the “**Statement**”) in connection with its appeal.¹

Response to Statement of Issues on Appeal

The sole issue on appeal is whether the Bankruptcy Court properly applied binding Ninth Circuit precedent in holding that, in a solvent debtor case, a general unsecured creditor receives postpetition interest on its claim at the Federal Judgment Rate.

Designation of Record on Appeal

Pursuant to Rule 8009 of the Bankruptcy Rules, the Reorganized Debtors hereby designate the following additional items to be included in the record on appeal, which include all exhibits and addenda attached thereto and filed therewith and all documents incorporated by reference therein:

Item	Filing Date	Dkt. No.²
Second Amended Verified Statement Of The Ad Hoc Committee Of Senior Unsecured Noteholders Pursuant To Bankruptcy Rule 2019	October 21, 2019	4369
Order Pursuant To 11 U.S.C. §§ 363(b) And 105(a) And Fed. R. Bankr. P. 6004 and 9019 (I) Approving And Authorizing The Debtors To Enter Into Restructuring Support Agreement With Consenting Noteholders And Shareholder Proponents, And (II) Granting Related Relief	February 5, 2020	5637
Notice Of Withdrawal Of Chapter 11 Plan Of Reorganization Filed By The Ad Hoc Committee Of Senior Unsecured Noteholders	February 5, 2020	5644

¹ Capitalized terms not otherwise defined herein have the meanings ascribed to them in the *Order Confirming Debtor’s and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization dated June 19, 2020* [Dkt. No. 8053] (together with all related documents, attachments, and exhibits, the “**Confirmation Order**”).

² Unless otherwise indicated, all references herein to “Dkt. No.” shall be to the docket maintained in the above-captioned chapter 11 cases.

Item	Filing Date	Dkt. No. ²
Notice of Appeal from Interlocutory Order Regarding Postpetition Interest of Ad Hoc Committee of Holders of Trade Claims	February 20, 2020	5844
Motion of Ad Hoc Committee of Holders of Trade Claims for Leave to Appeal Order Regarding Postpetition Interest	February 20, 2020	5845
Memorandum in Support of Motion of Ad Hoc Committee of Holders of Trade Claims for Leave to Appeal Order Regarding Postpetition Interest	February 20, 2020	5846
Notice of Appeal to District Court and Statement of Election of the Official Committee of Unsecured Creditors	March 5, 2020	6097
Cross-Motion of the Official Committee of Unsecured Creditors for Leave to Appeal Order Regarding Postpetition Interest	March 5, 2020	6101
Notice of Appeal and Statement of Election by the Ad Hoc Committee of Senior Unsecured Noteholders Concerning Interlocutory Order Regarding Postpetition Interest	March 5, 2020	6103
Cross-Motion of Administrative Agent for Leave to Appeal Order Regarding Postpetition	March 5, 2020	6120
BOKF's Notice of Appeal and Election to Have Appeal Heard by District Court Concerning Order Regarding Postpetition Interest	March 5, 2020	6122
BOKF's Cross-Motion for Leave to Appeal Order Regarding Postpetition Interest Filed by Interested Party BOKF	March 5, 2020	6124
Disclosure Statement For Debtors' And Shareholder Proponents' Joint Chapter 11 Plan Of Reorganization	March 17, 2020	6353
Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	May 1, 2020	7037
Second Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	May 24, 2020	7563
Third Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 2, 2020	7712
Fourth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 5, 2020	7810
Fifth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 8, 2020	7841
Sixth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 10, 2020	7879
Seventh Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 11, 2020	7894
Eighth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 12, 2020	7929
Ninth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 21, 2020	8057
Tenth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	July 10, 2020	8364
Motion for Leave to Appeal Order Regarding Postpetition	February 21, 2020	ECF No. 3, 20-cv-

Item	Filing Date	Dkt. No. ²
Interest		01493-HSG
Response of Ad Hoc Committee of Senior Unsecured Noteholders, BOKF, NA, and the Ad Hoc Group of Subrogation Claim Holders in Opposition to Motion for Leave to Appeal Postpetition Interest	March 13, 2020	ECF No. 31, 20-cv-01493-HSG
Debtors' Opposition to Motion for Leave to Appeal Order Regarding Postpetition Interest; Joinder of PG&E Shareholders	March 13, 2020	ECF No. 32, 20-cv-01493-HSG
Reply in Support of Motion of Ad Hoc Committee of Holders of Trade Claims for Leave to Appeal Order Regarding Postpetition Interest	March 27, 2020	ECF No. 48, 20-cv-01493-HSG
Reply of Citibank N.A., as Administrative Agent in Support of Cross-Motion for Leave to Appeal Order Regarding Postpetition Interest	March 27, 2020	ECF No. 51, 20-cv-01493-HSG
Order Denying Motion for Leave to Appeal	April 14, 2020	ECF No. 62, 20-cv-01493-HSG

The Reorganized Debtors reserve all rights to designate additional items to include in the record or restate the issues presented on appeal.

Dated: July 31, 2020

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Theodore E. Tsekerides
Theodore Tsekerides

Attorneys for Debtors and Reorganized Debtors